

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re:

RAMON VAUGHAN,

Debtor

Chapter 13

Case No. 18-04764 (RNO)

FRANKLIN MINT FEDERAL CREDIT UNION,

Movant

v.

RAMON VAUGHAN,

Respondent

**NOTICE OF MOTION OF FRANKLIN MINT FEDERAL CREDIT UNION FOR AN
ORDER APPROVING PROPOSED LOAN MODIFICATION AGREEMENT**

Franklin Mint Federal Credit Union has filed a motion for an order approving a proposed loan modification agreement in connection with a mortgage secured by real property located at 324 East 20th Street, Chester, Pennsylvania 19013.

If you object to the relief requested, you must file your objection/response within twenty-one (21) days of the date of this notice with the Clerk of Bankruptcy Court, Max Rosen U.S. Courthouse, 197 South Main Street, Room 247, Wilkes-Barre, PA 18701 and serve a copy on counsel, Corinne Samler Brennan, Esquire, at Klehr Harrison Harvey Branzburg LLP, 1835 Market Street, Suite 1400, Philadelphia, PA 19103.

If you do not file an objection/response within the time permitted, the Court will deem the motion unopposed and proceed to consider the motion without further notice or hearing and may grant the relief requested.

KLEHR | HARRISON | HARVEY |
BRANZBURG LLP

Corinne Samler Brennan, Esquire
Christopher J. Leavell, Esquire
1835 Market Street, Suite 1400
Philadelphia, PA 19103
Telephone: (215) 569-3393

Dated: December 18, 2019

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FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re:

RAMON VAUGHAN,

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FRANKLIN MINT FEDERAL CREDIT UNION,

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Chapter 13

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CERTIFICATE OF SERVICE

I, Christopher J. Leavell, Esquire, hereby certify that I did cause a true and correct copy of the foregoing notice and motion of Franklin Mint Federal Credit Union for an order approving a proposed loan modification agreement to be served on this 18th day of December 2019 by the CM/ECF System of the Bankruptcy Court upon the following parties in interest:

Vincent Rubino, Esquire
VRubino@newmanwilliams.com
epotito@newmanwilliams.com
lhochmuth@newmanwilliams.com
mdaniels@newmanwilliams.com
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Charles J. DeHart, III
dehartstaff@pamd13trustee.com
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Office of the United States Trustee
USTPRegion03.HA.ECF@usdoj.gov

James Warmbrodt, Esquire
bkgroup@kmlawgroup.com

I, Christopher J. Leavell, Esquire, hereby certify that I did cause a true and correct copy of the foregoing notice and motion to be served on this 18th day of December 2019 by U.S. Mail, postage prepaid, upon all parties listed below:

Ramon Vaughan
1212 Lisa Lane
Canadensis, PA 18325

Richeem Louise Jennings
1212 Lisa Lane
Canadensis, PA 18325

Capital One
PO Box 3028
Salt Lake City, UT 84130-0285

IRS
Centralized Insolvency OP
PO Box 7346
Philadelphia, PA 19101-7346

PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541

KLEHR | HARRISON | HARVEY |
BRANZBURG LLP

By: /s/ Christopher J. Leavell
Corinne Samler Brennan, Esquire
Christopher J. Leavell, Esquire
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